

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 11-10201-NMG
	)	
ROBERT A. GEORGE,	)	
Defendant.	)	

**UNITED STATES' BILL OF PARTICULARS FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, Carmen M. Ortiz, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On April 7, 2011, a federal grand jury sitting in the District of Massachusetts returned a Seven-count Indictment charging defendant Robert A. George (the "Defendant") with Money Laundering Conspiracy, in violation of 18 U.S.C. § 1956(h) (Count One); Money Laundering, in violation of 18 U.S.C. §§ 1956(a)(3)(B) and 1956(a)(3)(C) (Count Two through Six); and Structuring Transactions to Evade Reporting Requirements, in violation of 31 U.S.C. § 5324(a)(1) (Count Seven).

The Indictment contained a Money Laundering Forfeiture Allegation, which gave the Defendant notice that the United States sought forfeiture, pursuant to 18 U.S.C. § 982(a)(1), upon conviction of one or more of the offense alleged in Counts One through Six of the Indictment, of any and all property, real or personal, involved in such offense, and all property traceable to such property.

The Indictment also contained a Structuring Forfeiture Allegation, which gave the Defendant notice that the United States sought forfeiture, pursuant to 31 U.S.C. § 5317(c)(1),

upon conviction of the offenses alleged in Count Seven of the Indictment, of any and all property, real or personal, involved in such offense, and all property traceable to such property.

Pursuant to, and without limiting in any manner the Forfeiture Allegations of the Indictment, the United States hereby gives notice that it is seeking forfeiture of, without limitation, the following specific property:

1. one 2008 Lexus GS350, Vehicle Identification Number JTHCE96S480020435, and Massachusetts Registration Number 785MY9.

Respectfully submitted,

CARMEN M. ORTIZ,  
United States Attorney,

By: /s/ Mary B. Murrane  
LAURA KAPLAN  
MARY B. MURRANE  
Assistant United States Attorneys  
U.S. Attorney's Office  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100

Dated: August 1, 2011

#### **CERTIFICATE OF SERVICE**

I hereby certify that this document, filed through the Electronic Court Filing system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Mary B. Murrane  
Mary B. Murrane  
Assistant U.S. Attorney

Dated: August 1, 2011